



PRYOR CASHMAN LLP

New York | Los Angeles | Miami

7 Times Square, New York, NY 10036-6569 Tel: 212-421-4100 Fax: 212-326-0806

pryorcashman.com

Maxwell Breed
Partner

Direct Tel: (212) 326-0113
mbreed@pryorcashman.com

August 13, 2025

BY ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Lively v. Wayfarer Studios LLC, et al.*, No. 1:24-cv-10049-LJL

Dear Judge Liman:

As noted in our filing last night, we have created an expanded and revised privilege log to further clarify the limited scope of materials withheld by our clients, nonparties Katherine Case and Breanna Butler Koslow, on the basis of attorney-client privilege and attorney work product.

This revised privilege log breaks out communications on a conversation-by-conversation basis, where each “conversation” represents a 24-hour period of messages that contained an agreed-upon search term. The dates in the log represent the dates of those conversations, whereas our original privilege logs were based upon metadata, which at times would list an earlier date associated with an embedded file (e.g., an image) in the message string.

In light of our provision of this information, we would not oppose Ms. Lively submitting a reply in further support of her motion, taking into account the clarified information present in this privilege log.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "MB".

Maxwell Breed

cc: Counsel of Record (by ECF)
Enclosures